

THE HONORABLE BARBARA J. ROTHSTEIN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PARLER LLC,

Plaintiff,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

No. 2:21-cv-00031-BJR

JOINT STIPULATION AND
[PROPOSED] ORDER FOR
AMENDMENT AND RESPONSE
SCHEDULE

**NOTE ON MOTION CALENDAR:
February 16, 2021**

JOINT STIPULATION

Pursuant to the Court's Standing Order (Dkt. 35), and the Joint Stipulation and the Court's Order dated January 28, 2021 (Dkt. 38), the Parties submit the following stipulation:

1. The deadline for Plaintiff Parler LLC ("Parler") to file its Amended Complaint is February 16, 2021.
2. The deadline for Defendant Amazon Web Services, Inc. ("AWS") to respond to Plaintiff Parler's Amended Complaint is March 22, 2021.

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(CASE NO. 2:21-cv-31-BJR) – 1



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- 1 3. Counsel for Parler represents that on or about Saturday, February 13, 2021, Parler
2 engaged the legal services of Mr. Angelo J. Calfo of the Calfo Eakes LLP law
3 firm. In sum, Parler believes that it and Mr. Calfo need an extension of time for
4 Mr. Calfo to review the pleadings and to be prepared to assist Parler and its current
5 counsel with the filing of the Amended Complaint.
6
- 7 4. Moreover, counsel for Parler represents that Parler has been working to pursue its
8 working model to get back online; that Parler was able to get back online beginning
9 on February 15, 2021; and Parler believes that this factual development, which
10 occurred just one day before the current deadline to file the Amended Complaint,
11 will have a material impact on how Parler pleads the Amended Complaint.
12
- 13 5. Counsel for Parler is familiar with the Court's Standing Order (Dkt. 35), which
14 requires extensions of time be requested three days in advance. However, Parler's
15 counsel believes that good cause exists to adjust the scheduling of the
16 aforementioned pleadings and that the administration of justice will be served
17 thereby.
18
- 19 6. AWS does not oppose Parler's request for additional time.
20
- 21 7. On January 25, 2021, the Court entered an Order setting Initial Scheduling Dates.
22
- 23 8. The parties agree that upcoming deadlines should be revised, as set forth below.
24 a. Parler will file an Amended Complaint no later than March 2, 2021;
25 b. AWS's deadline to respond to Parler's Amended Complaint will be April
26 8, 2021;
27 c. Deadline for FRCP 26(f) conference: May 21, 2021
28 d. Initial Disclosures: May 28, 2021
29
30



e. Joint Status Report and Discovery Plan: June 4, 2021

9. The parties respectfully request that the Court memorialize these revised deadlines by entering the proposed order accompanying this stipulation.

Dated this 15th day of February, 2021.

Respectfully submitted,

DAVID J. GROESBECK, P.S.

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Counsel for Amazon Web Services, Inc.



ORDER

Pursuant to the stipulation, IT IS SO ORDERED.

DATED this _____ day of _____, 2021.

BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE

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